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June 18, 2004

VIA HAND DELIVERY

Honorable Richard Collier
General Counsel
c/o Sharla Dillon, Docket & Records Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

**RE: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireless to Wireless Number
Portability Obligations Pursuant to Section 251(f)(2) of the
Communications Act of 1994, As Amended
TRA Docket No. 03-00633**

Dear Hearing Officer Collier:

Enclosed for filing is one (1) copy of Verizon Wireless' Supplemental Responses to the Coalition's Discovery Requests. Also enclosed is an additional copy of the same to be "Filed Stamped" for our records.

Verizon Wireless' Supplemental Responses contain **CONFIDENTIAL INFORMATION**. Pursuant to the Protective Order in this Docket, the confidential information has been properly marked and is being submitted under seal.

If you need any additional information, please let me know.

Very truly yours,


Melvin J. Malone

MJM:cgb
Enclosure

cc: Stephen G. Kraskin, Esq.
Timothy C. Phillips, Esq.
R. Dale Grimes, Esq.
Edward Phillips, Esq.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

IN RE:

TENNESSEE COALITION OF RURAL
INCUMBENT TELEPHONE
COMPANIES AND COOPERATIVES
REQUEST FOR SUSPENSION
OF WIRELESS TO WIRELESS
NUMBER PORTABILITY
OBLIGATIONS PURSUANT TO
SECTION 251(f)(2) OF THE
COMMUNICATIONS ACT OF 1994, AS
AMENDED

Docket No. 03-00633

THIS DOCUMENT CONTAINS
CONFIDENTIAL INFORMATION ¹

**SUPPLEMENTAL RESPONSE OF CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS TO THE COALITION'S FIRST SET OF
DISCOVERY REQUESTS TO VERIZON WIRELESS**

On May 27, 2004, Cellco Partnership, d/b/a Verizon Wireless on behalf of itself and its affiliates operating in Tennessee ("Verizon Wireless"), timely submitted its responses to the Discovery Requests propounded by the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives (the "Coalition"). Verizon Wireless hereby supplements its responses to Request Nos. 3, 5, 8(b), 8(d), 8(g) and 9 of the Coalition's Discovery Requests to Verizon Wireless. These supplements replace in the entirety the previous responses to Request Nos. 8(d), as related to Chris Jones, and 9.²

¹ This document and/or the attachments hereto contain confidential and proprietary information Pursuant to the Protective Order in this Docket, said confidential information is marked "CONFIDENTIAL INFORMATION" and submitted in sealed envelopes

² Verizon Wireless incorporates herein by reference, without exception, any and all objections previously made in this matter with respect to Request Nos. 3, 5, 8(b), 8(d), 8(g), and 9

GENERAL OBJECTIONS

Verizon Wireless objects to all interrogatories and requests for production involving documents or data from jurisdictions other than Tennessee. Such documents or data have no application to the present dispute, are irrelevant to a determination of the issues raised in this proceeding, and will not lead to relevant discovery. Therefore, in responding to interrogatories and requests for production, Verizon Wireless will presume that all data and documents requests involve only activities occurring in Tennessee.

Verizon Wireless further objects to all interrogatories and requests for production involving documents that are (1) subject to the attorney-client privilege, (2) attorney work-product, or (3) prepared in anticipation of litigation.

Without waiving any of the above objections, Verizon Wireless responds as follows:

SUPPLEMENTAL RESPONSES

3. Please state whether Verizon Wireless can comply with porting requests and provide service for customers within all areas serviced by the Coalition. If there are any areas where Verizon Wireless cannot accept porting requests and provide service within this area, please specify the exchange and the Coalition member that serves that location.

SUPPLEMENTAL RESPONSE: As a supplement to its initial response to Request No. 3, Verizon Wireless submits the chart attached hereto and marked as **Exhibit A**³

5. Please state your position on how calls to a ported number should be routed by the Coalition member.

SUPPLEMENTAL RESPONSE: As a supplement to its initial response to Request No. 5, Verizon Wireless submits the following.

Verizon Wireless refers the Coalition to the soon to be filed Rebuttal Testimony of Greg Cole.

8. Requests 8(b), 8(d) and 8(g) - William Christopher ("Chris") Jones.

8(b) provide complete background information, including the expert's current employer as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the witness;

SUPPLEMENTAL RESPONSE: Without waiving its previous objections, Verizon Wireless supplements its initial response to Request 8(b), as related to Chris Jones, as follows.

For additional responses to this request relating to Mr. Jones' qualifications as a witness in this matter or relating to number portability, see the supplemental response to Request 8(d) below.

8(d) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and

³ **Exhibit A** is a CONFIDENTIAL document in the entirety and is being submitted, pursuant to the Protective Order in this Docket, under seal

forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

SUPPLEMENTAL RESPONSE: Verizon Wireless objects to this request on the grounds that it is overly broad and unduly burdensome. This request is not tailored to the issues relevant and material to this matter, to Mr. Jones' role as Associate Director of State and Area Public Policy for Southeastern Region for Verizon Wireless, or to the area of telecommunications and is not reasonably calculated to lead to the discovery of relevant, material, and admissible evidence. Without waiving its objections, Verizon Wireless responds as follows.

To the best of his recollection, Mr. Jones has presented testimony/comments/presentations before the following state utility/public service commissions: Alabama, California, the District of Columbia, Florida, Georgia, Indiana, Kentucky, Maryland, North Carolina, Ohio, South Carolina, Tennessee and Texas. To the best of Mr. Jones' recollection, the testimony/comments/presentations involved the following: the Alabama testimony occurred from 2001 – 2004 and related to the regulation of wireless carriers, the District of Columbia testimony occurred in 2003 and related to 911, the Florida testimony occurred in 2003 and related to 211; the Georgia testimony occurred in 2002 and related to 211; the Indiana testimony occurred prior to 2000 and related to 911; the Kentucky testimony occurred in 2003 and related to Verizon Wireless Service in Kentucky, with some information related to LNP; the Maryland testimony occurred in 2002 and related to 911 issues; the North Carolina testimony occurred from 1998 – 2003 and related to 911; the Ohio testimony occurred in 1998 and related to deregulation; the South Carolina testimony occurred in 2002 and related to 911; the Tennessee testimony occurred in 2000 in *In Re: Universal Service for Rural Areas Generic Docket*, TRA Docket # 00-00523, and in 2003 related to Verizon Wireless Service in Tennessee; and the Texas testimony occurred in 2003 and related to Verizon Wireless Service in Texas, with some information related to LNP.

While not formal testimony in the context of a hearing, Mr. Jones did publicly present the CTIA's Consumer Code for Wireless Carriers before the Tennessee Regulatory Authority in 2003.

To the best of his recollection, Mr. Jones has presented comments/testimony before the following state legislative bodies: Alabama, Florida, Georgia, Maryland, South Carolina, and Tennessee. With respect to his comments/testimony before legislative bodies, Verizon Wireless objects to the request to identify dates, subject matter, and the transcript on the grounds that such requests are over broad, unduly burdensome, and expensive and is not reasonably calculated to lead to the

discovery of relevant, material, and admissible evidence. Without waiving its objections, Verizon Wireless responds as follows To the best of his recollection, Mr. Jones has appeared before the following bodies, at the time and on the subjects listed: the Metropolitan Atlanta Rapid Transit Authority Hearing, Alpharetta, Georgia in 2002 related to MARTA routes; the County Council, Montgomery County, Maryland related to city taxes in 2003; and the Maryland House Environmental Matters Committee related to proposed hands free legislation in 2003

(g) identify all documents or things shown to, delivered to, received from, relied upon, or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that expert for review in connection with testimony and opinions; and

SUPPLEMENTAL RESPONSE: Without waiving its previous objections, Verizon Wireless responds as follows.

The entire record of this proceeding.

8. Request 8(g) – Gregory Curtis (“Greg”) Cole.

(g) identify all documents or things shown to, delivered to, received from, relied upon, or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that expert for review in connection with testimony and opinions; and

SUPPLEMENTAL RESPONSE: Without waiving its previous objections, Verizon Wireless responds as follows.

The entire record of this proceeding.

9. Please produce copies of any and all documents referred to or relied upon in responding to the Coalition's discovery requests.

SUPPLEMENTAL RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is

subject to the attorney-client privilege. To the extent this request seeks documents prepared in anticipation of litigation or for hearing and not generally discoverable, Verizon Wireless objects to this request on the grounds that the requesting party has not demonstrated a substantial need of the materials in the preparation of the case. Further, under the Telecommunications Act of 1996 and the FCC's rules and orders, the Coalition has the evidentiary burden in this matter, not any opposing party. Without waiving the foregoing objections, Verizon Wireless responds as follows.

The following are responsive to this request: various FCC notices, orders, rules, and the like⁴ related to number portability and interconnection, the Telecommunications Act of 1996, Verizon Wireless' bona fide requests to Coalition members, CTIA's Consumer Code for Wireless Carriers, the 2003 Florida Presentation by Chris Jones before the Florida Public Service Commission, the 2003 Georgia Presentation by Chris Jones before the Georgia Public Service Commission, the 2002 Testimony of Chris Jones before the Metropolitan Atlanta Rapid Transit Authority, the 2003 Kentucky Presentation by Chris Jones before the Kentucky Public Service Commission, the 2002 Testimony of Chris Jones before MARTA, the 2003 Maryland testimony of Chris Jones before the House Environmental Matters Committee, the 2002 Maryland Presentation by Chris Jones before the Maryland Public Service Commission, the 2003 Testimony of Chris Jones before the County Council for Montgomery County, Maryland, the 1998 Ohio Presentation by Chris Jones before the Ohio Public Service Commission, the 2000 Tennessee testimony of Chris Jones in *In Re: Universal Service for Rural Areas Generic*

⁴ In response to the Coalition's request for clarification, as set forth in the Coalition's June 10th letter, the phrase "and the like" is intended to refer to any and all other items issued from the Federal Communications Commission related to number portability and interconnection

Docket, TRA Docket # 00-00523, the 2003 Tennessee Presentation by Chris Jones before the Tennessee Regulatory Authority, and the 2003 Texas Presentation by Chris Jones before the Texas Public Service Commission.

With respect to the foregoing response, Verizon Wireless objects to this request for production in part on the grounds that some of the information is obtainable from a more convenient and less burdensome source. This objection applies to the CTIA's Consumer Code for Wireless Carriers, which is available at www.ctia.org, and the testimony filed by Mr. Jones in TRA Docket No. 00-00523, which is available at the TRA's web site. Further, this objection also applies to various FCC notices, orders, and rules related to number portability and interconnection, the Telecommunications Act of 1996, and Verizon Wireless' bona fide requests to Coalition members. Certain other documents referred to above are attached hereto.⁵

See also Verizon Wireless' responses to Request Nos. 2, 3 and 8(g).

⁵ Portions of **Exhibits B, C, and D** contain CONFIDENTIAL INFORMATION. See note 1 *supra*. Pursuant to the Protective Order in this Docket, portions of said items are being submitted under seal. By agreement of the parties, **Exhibits B, C, and D**, the Tennessee, Kentucky, and Texas presentations made by Chris Jones are being submitted as representative of other similar presentations referenced herein.

OATH

STATE OF North Carolina)
COUNTY OF Mecklenburg)

I, Gregory C. Cole, on behalf of Verizon Wireless, being first duly sworn according to law, make oath that the preceding answers and responses to the Discovery Requests submitted by the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives are true, accurate and correct to the best of my knowledge, information and belief

On Behalf of Verizon Wireless

By: 


Gregory C Cole

Its: _____

South Area – Transport Planning
Manager

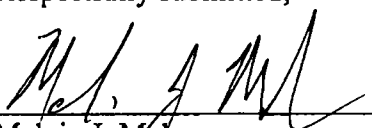
Sworn to and subscribed before me this 18th day of June, 2004.

NOTARY PUBLIC
STATE OF NORTH CAROLINA
CABARRUS COUNTY
CATHARINE LAWSON
MY COMMISSION EXPIRES
JANUARY 4, 2005


Notary Public

My Commission Expires: _____

Respectfully submitted,

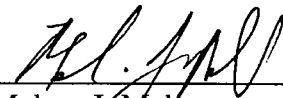

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1200 One Nashville Place
150 Fourth Avenue North
Nashville, TN 37219-2433
(615) 244-9270

Counsel for Celco Partnership d/b/a
Verizon Wireless

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2004, a true and correct copy of the foregoing has been served on the parties of record, via the method indicated:

<input checked="" type="checkbox"/>	Hand	Dale Grimes Tara Swafford Bass, Berry & Sims 315 Deaderick Street, Suite 2700 Nashville, TN 37238-3001
<input type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	Electronically	
<input type="checkbox"/>	Hand	Thomas J. Moorman Stephen G. Kraskin Kraskin, Lesse & Cosson, LLP 2120 L Street NW, Suite 520 Washington, D.C. 20037
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
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<input type="checkbox"/>	Hand	Timothy Phillips Office of the Attorney General Consumer Advocate and Protection Division 425 5 th Avenue North Nashville, TN 37202
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
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<input type="checkbox"/>	Electronically	
<input type="checkbox"/>	Hand	Edward Phillips Sprint 14111 Capital Boulevard Wake Forest, NC 27587
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
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<input type="checkbox"/>	Electronically	
<input type="checkbox"/>	Hand	Ann Hoskins Lolita Forbes Verizon Wireless Legal & External Affairs Department 1300 I Street, N.W., Suite 400 West Washington, D.C. 20005
<input checked="" type="checkbox"/>	Mail	
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 Melvin J. Malone
 J. Barclay Phillips
 Miller & Martin, PLLC

**Testimony of
W. Chris Jones – Associate Director – State Public Policy
Verizon Wireless
at the Metropolitan Atlanta Rapid Transit Authority Hearing
Alpharetta, GA
Wednesday, July 17, 2002**

Good Evening:

My name is Chris Jones, and I am Associate Director of Public Policy for Verizon Wireless. My purpose in being here is to express our concern about Marta's plans to reduce the level of bus service to the North Fulton County area near Windward Parkway—specifically the elimination of Route # 140, Northpoint and creation of proposed Route #143, Windward Parkway/Ride.

Verizon Wireless has three buildings located near Georgia 400 North in the Windward Parkway – Deerfield Parkway area. This facility is made up of over 2,000 employees and plays a pivotal role in the success and growth of the Verizon Wireless business. The campus serves as South Area and Georgia Region Headquarters and perform a generous list of functions supporting our operations in 12 states. As we continue to grow and expand our operations, we will need to attract, recruit and retain a broad range of talented professionals that rely on MARTA service to get to Alpharetta.

One of the components of our facility is a state-of-the-art Customer Contact Center. In the fall of this year, we expanded the size of the workforce in this facility to 600- employees. The employees who work at the Center are multi-skilled, trained, talented professionals that service Verizon Wireless customer accounts in multiple states. In fact, collectively, these employees handle over 126,000 customer calls a month. In

addition to these employees, we have others that rely on MARTA including mailroom, security, cafeteria and other personnel.

While we understand MARTA's need to operate more efficiently, we would like to ask the Board to consider the potential economic impact on the Windward Parkway Community. An informal survey of employees this week revealed that nearly 70 of the 600 employees in our contact center rely upon MARTA as their primary transportation to and from work. They utilize both the rail and bus services. So elimination of the bus routes that connect to the light rail systems may force these employees to find alternative transportation options that could further decrease MARTA's rail ridership.

If you were to take a ride to Windward Parkway, you would be in the middle of what has become a High-Technology Corridor. In the last two years, we have welcomed our competitors and suppliers to the North Fulton County area. In the last few months we have applauded the arrival of several new restaurants, hotels, a print shop and numerous other small businesses to the neighborhood. For example, a Home Depot opened last year and a new Wal-Mart Super Center, Lowe's, McDonald's and several new restaurants are under construction now and will open soon. We believe that the demonstrated growth of the businesses in the area further supports the need to have reliable transportation now and in the immediate future. The expected increased business activity in the area ultimately leads to increased ridership for MARTA.

Verizon Wireless is proud to be a member of the Alpharetta/North Fulton County business community. We welcome an opportunity to work with MARTA and the local governments of Fulton County to explore opportunities or alternatives that ensure this

needed transportation infrastructure is in place to permit continued and expanded job opportunities in this area.

Thank you.

**TESTIMONY PRESENTED BY
AT&T WIRELESS, CINGULAR WIRELESS, NEXTEL COMMUNICATIONS,
SPRINT PCS, T-MOBILE USA AND VERIZON WIRELESS
TO THE
COUNTY COUNCIL FOR
MONTGOMERY COUNTY, MARYLAND
AT A PUBLIC HEARING
APRIL 28, 2003**

**OPPOSITION TO RESOLUTION NO. ____
REGARDING IMPOSITION OF "TELEPHONE TAX - RATES"**

This testimony is presented on behalf of AT&T Wireless, Cingular Wireless, Nextel Communications, Sprint PCS, T-Mobile USA, and Verizon Wireless. We appreciate the opportunity to testify tonight on the proposed Resolution to impose a monthly excise tax on each wireless phone service "line" billed to an address in Montgomery County.

This Resolution would reinstate an unpopular, discriminatory tax that singles out the telecommunications industry. The rate of this discriminatory tax on wireless services would be \$2.00 per customer, per month. Assuming a \$40.00 monthly bill, this \$2.00 line charge results in a 5% effective local tax rate. Combining this 5% effective local tax rate with the state sales tax rate of 5% and the federal excise tax rate of 3% makes the level of taxation for wireless service in Montgomery County (**13%**) one of the highest in the nation. And for customers that have a lower priced monthly service plan, such as low-income customers or customers that obtain service primarily to make emergency health or safety calls, the effective local tax rate could be up to 10%. That's a local tax rate which even exceeds the tax rate in Prince George's County and when combined with the state sales tax rate (for a total of 15%) makes it one of the highest rates for any local jurisdiction in the United States.

Even more significant, this discriminatory tax makes Montgomery County only the second locality in Maryland, in addition to Prince George's County, to impose a tax on wireless telecommunications services. Other federal and state regulatory fees layered on top of these taxes make the cost of service even higher. For example, the state 911 surcharge fee will be increased from 10 cents to 25 cents per month for wireless and wireline customers, effective on October 1. Furthermore, the new state 911 service law authorizes Montgomery County and other localities to increase the local 911 surcharge from 50 cents up to 75 cents per month for our customers.

Wireless service is a competitive consumer service – six nationwide companies and a number of smaller local companies sell the service in malls and stores across the nation, like other consumer products. This differs from how utility services are sold.

Consumers' decisions as to whether to purchase the service are very price sensitive – wireless service companies are frequently competing for communications and entertainment dollars of consumers. Because of the high elasticity of demand for wireless communications services, an increase of \$2.00 per month could result in some Montgomery County residents choosing to forego the purchase of the wireless services. Taxes really do matter when it comes to the profitability of wireless service.

Wireless phones are a critical disaster and emergency response tools for the constituents of Montgomery County. Wireless devices enable parents to communicate with their children at school or with their children's day care center while away from home or at work. In addition, wireless Internet service will provide consumers with another high-speed alternative to access the Internet, which provides students with new, advanced learning tools.

Imposing a very high level of taxes on the telecommunications industry is contrary to efforts to encourage economic growth. For technology and other growth businesses looking to locate offices in Maryland, this very high level of taxation makes Montgomery County far less attractive than most of its neighboring jurisdictions. As more and more large and small businesses view wireless service as a critical productivity tool for their employees, either through mobile phones that enable seamless contact with the office when on the road, between employees at different work sites or through mobile Internet service, the excessive level of taxation imposed on wireless service in Montgomery County is likely to detract from the County's ability to attract these growth businesses

The wireless communications industry is still growing and looking to invest more capital in our networks that will provide consumers with increased flexibility and businesses with additional productivity tools. Obviously, the way to increase use of this tool – which enhances flexibility and productivity – is to lower taxes, not raise them. We believe that the Council should oppose this Resolution.

Testimony
W. Chris Jones - Associate Director Public Policy
Verizon Wireless

HB 63
Before the House Environmental Matters Committee
Tuesday, February 4, 2003

Good morning, Chairman _____ and members of the committee.

My name is W. Chris Jones and I am Associate Director-Public Policy for Verizon Wireless.

I would like to thank you for allowing me to address the Committee on this important matter.

"If the state of Maryland chooses to pursue responsible driving legislation, Verizon Wireless could support HB 63 if it were amended to have a reasonable "phase in" date

As introduced, HB 63 would be effective Oct. 1, 2003. Verizon Wireless believes that an effective date of March 1, 2004 would be more realistic. A more reasonable 'phase-in-period,' similar to that used with the seat belt law would better permit existing wireless phone users who do not have hands-free devices or phones to make the necessary arrangements.

Many new phones today come equipped with voice-activated capability, however there are estimated to be over 2 million wireless phones in the state. Not all phones are compatible with hands free use and this period would allow customers to complete current contracts and arrange for new equipment.

Verizon Wireless is the nations leading wireless provider, serving over 32.5 million lines in 96 of the top 100 markets in the United States. As the leading provider, we have taken an active role in advocating the responsible use of wireless phones while driving.

As a company, we promote the use of hands free devices in every facet of our business, from marketing and sales, customer communications and our public policy initiatives. Education of our customers is an essential part to create responsible driving. We, along with industry, continue to make a large effort to inform and encourage our customers to act responsibly when using their phones.

Some of the discussion regarding this legislation has referenced articles concerning a so-called study by the Harvard Center for Risk Analysis. The 'study' relies on two prior studies – one from 1999 by The AEI-Brookings Institute and another from 1997 by University of Toronto – and reaches the same conclusions – ***regulating wireless phone***

use while driving is not the answer and that there are better ways to improve driver safety.

The study's 'findings,' as described by the authors themselves, are based on *estimates and assumptions* from the previous studies – not facts. They also state that certain risks *may or may not* be linked to wireless phone use. Furthermore, the authors caution that their estimates of risk are "very uncertain" and that "the range of uncertainty is very wide."

Finally, they conclude 1) that the costs and benefits of using wireless phones in cars are roughly equal and 2) that regulations restricting wireless phone use are less cost effective for society than other safety measures.

In the past few years, most states have proposed and discussed the need for legislation to restrict the use of wireless phones in some manner. Verizon Wireless has supported certain legislation that conforms to what we believe is a reasonable alternative; should it be determined that legislation is necessary.

Verizon Wireless will support legislation that includes the following points:

- It must recognize the safety value of wireless phones.
- It must explicitly exempt emergency calls.
- The law must be uniform state-wide.
- It must not assess fines greater than for current careless driving offences, and
- It must have a reasonable phase in period to allow customers to comply with the law. Not all phones are compatible with hands free use and this period would allow customers to complete current contracts and arrange for new equipment. New voice-activated equipment now available should be widely available in the near future to enhance the quality of hands free use.

House Bill 63, as it now stands, does not conform to our position. We recommend that the following amendments be made.

- A provision to ensure state-wide application should be added.
- An appropriate phase-in period should be added to the bill to allow customers to adapt to the new law

If these changes were made, Verizon Wireless would be in a position to support the legislation.

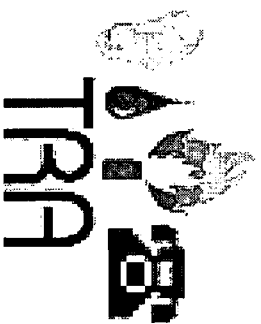
The Maryland legislature must first determine if legislation is necessary to deal with the use of wireless phones. If you do, then Verizon Wireless believes that the appropriate way to do so would be with this bill, as amended.

Thanks you for the opportunity to share our thoughts with you on this important matter.

Exhibit B
Verizon Wireless

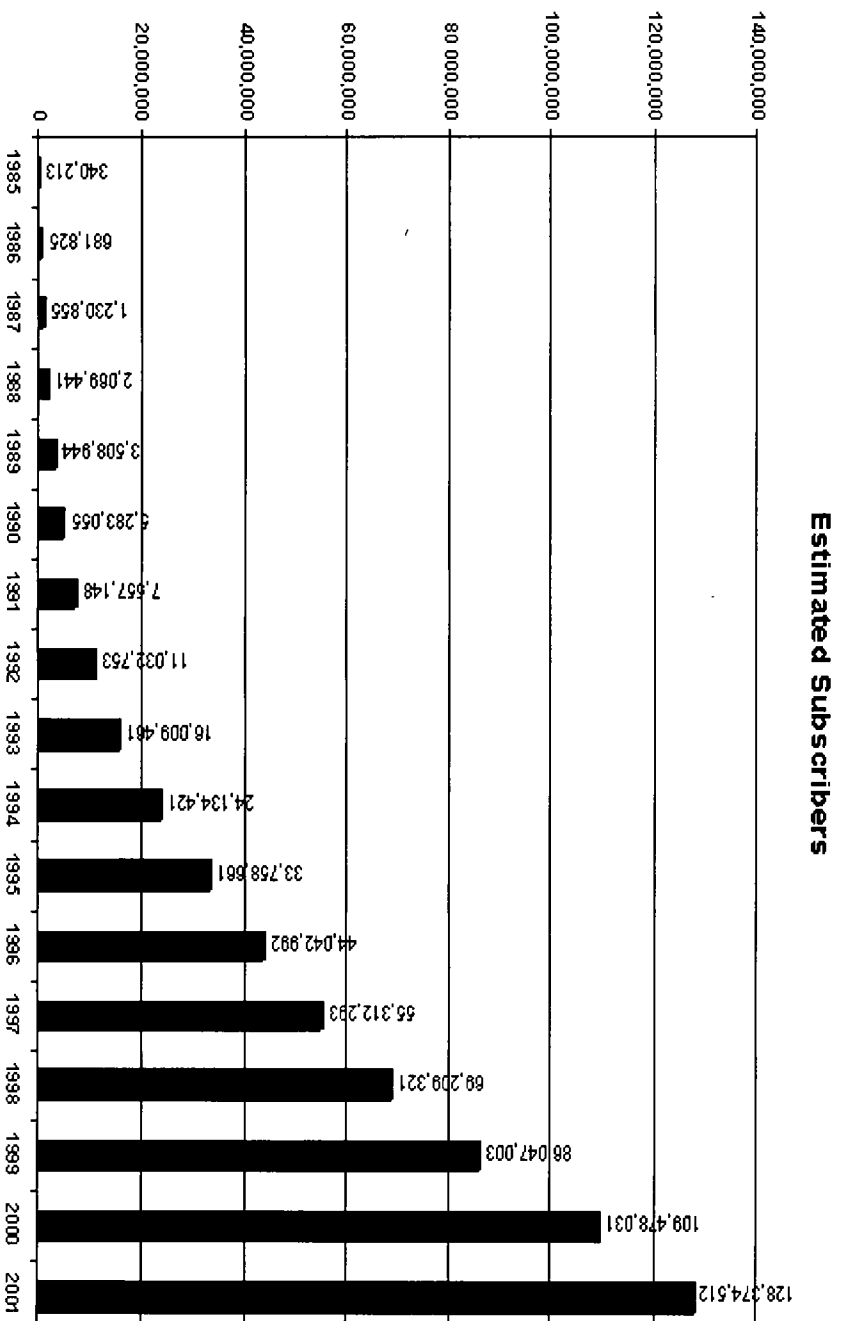
Exhibit B Contains CONFIDENTIAL INFORMATION

Wireless Services Briefing



January 23, 2003

Subscriber Growth Continues



Subscribers Grew 17.3 Percent Year Over Year

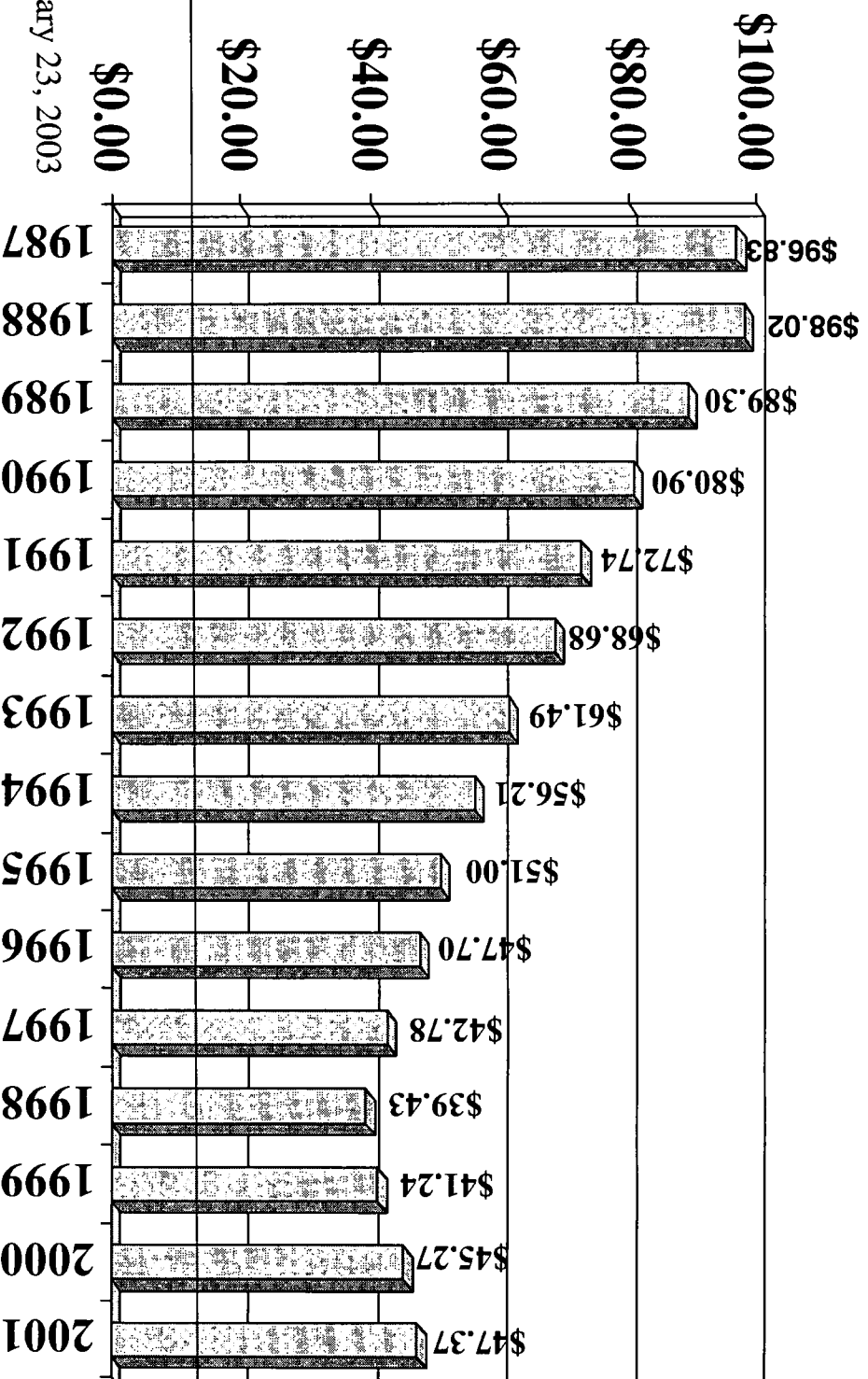
Source: CITE
Estimated figures not be reproduced or photocopied in any form without written permission from CITE.
© 2002 Cellular Telecommunications Industry Association

January 23, 2003

Competition Drives Down the Cost of Wireless Service

Average Local Wireless Monthly Bill: 1987 - 2001

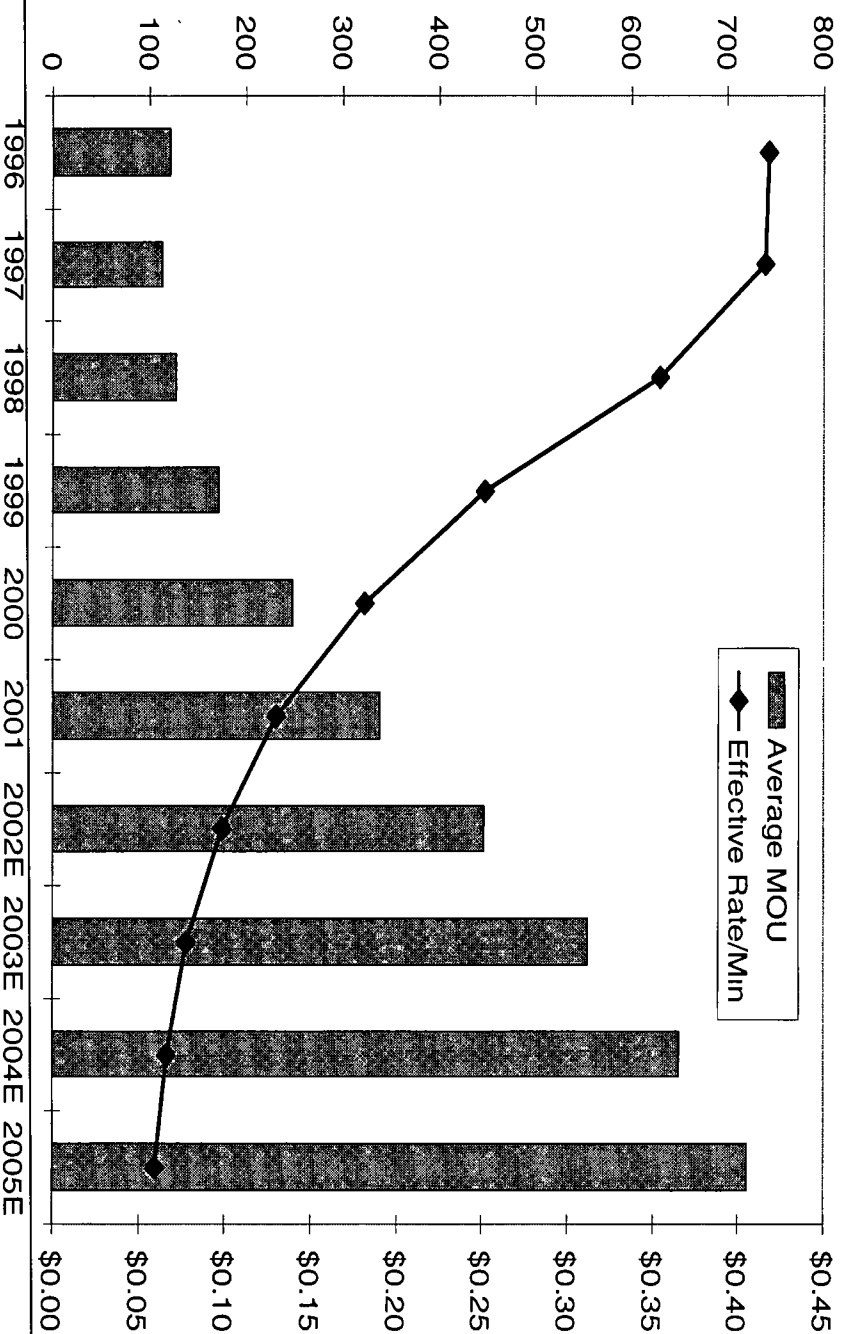
While the average minutes of use grew more than 51% from 2000 - 2002, there was an increase of less than 5% in the average monthly bill - from \$45.27 to \$47.37 - over the same period.



January 23, 2003

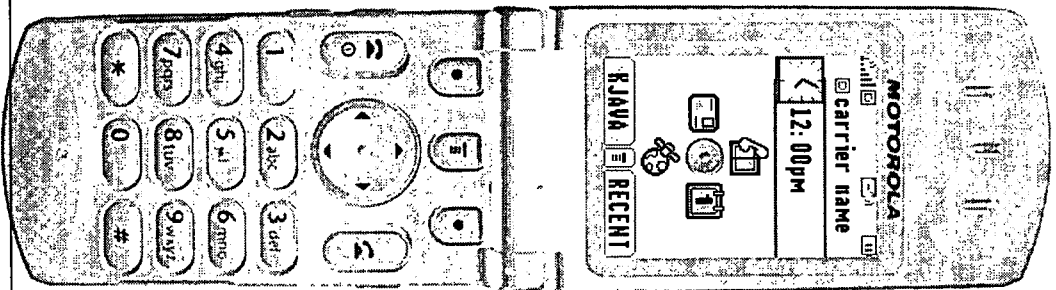
Wireless Delivers Higher Values

It's not just about lower prices



January 23, 2003

Products & Services



Got some time to kill? get it now!

Get it Now! Instantly on your phone.

- get games** - Download games like Tetris, Snake, and more.
- get going** - Download ringtones and wallpapers.
- get tones** - Download ringtones and wallpapers.

RockShack - The place where you can get it all.

See how easy text messaging can be...

Ready 2 TXT

Information Alerts
Get the latest fun facts for show and tell sent directly to your phone.

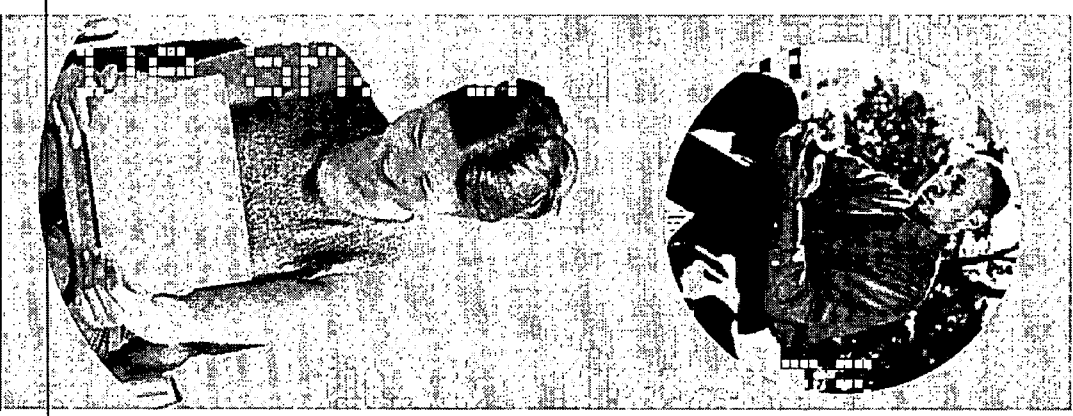
USA TODAY.com

Instant Messaging
Use your phone to stay in touch. No matter when, no matter where.

msn Messenger
Add Instant Messenger

Communities
Chat room in every phone. Start your own group or find and join a group.

Register today!



January 23, 2003

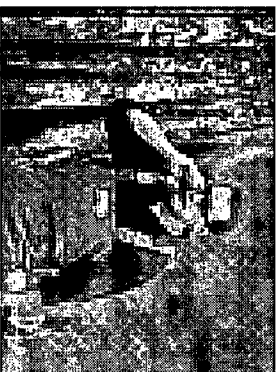
“Worry Free Guarantee”

- 5-point customer service standard – a money back guarantee on all equipment and other services without penalty or fees if customer is not satisfied!
 - Largest, most advanced nationwide network.
 - Option to change to any qualifying plan/promotion anytime.
 - Your problem is Our problem, the first time!
 - Free phone every 2 years with New Every Two.
 - Satisfaction guaranteed on any equipment purchase.

Summary

- Verizon Wireless remains committed to Network Superiority.
- Verizon Wireless is approaching Customer Service as a differentiator.
- Verizon Wireless is committed to working with TRA on consumer concerns.

Verizon Wireless



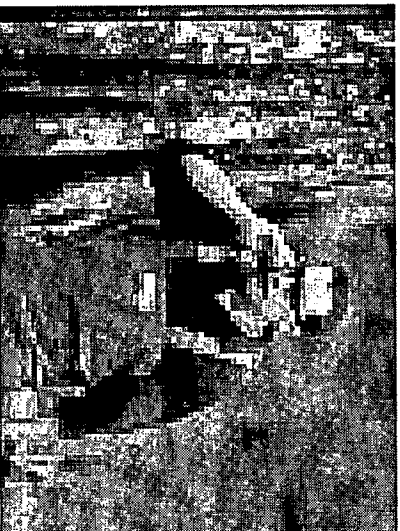
*Building the best wireless
network
is not just our job,
it's our obsession!*

January 23, 2003

Exhibit C
Verizon Wireless

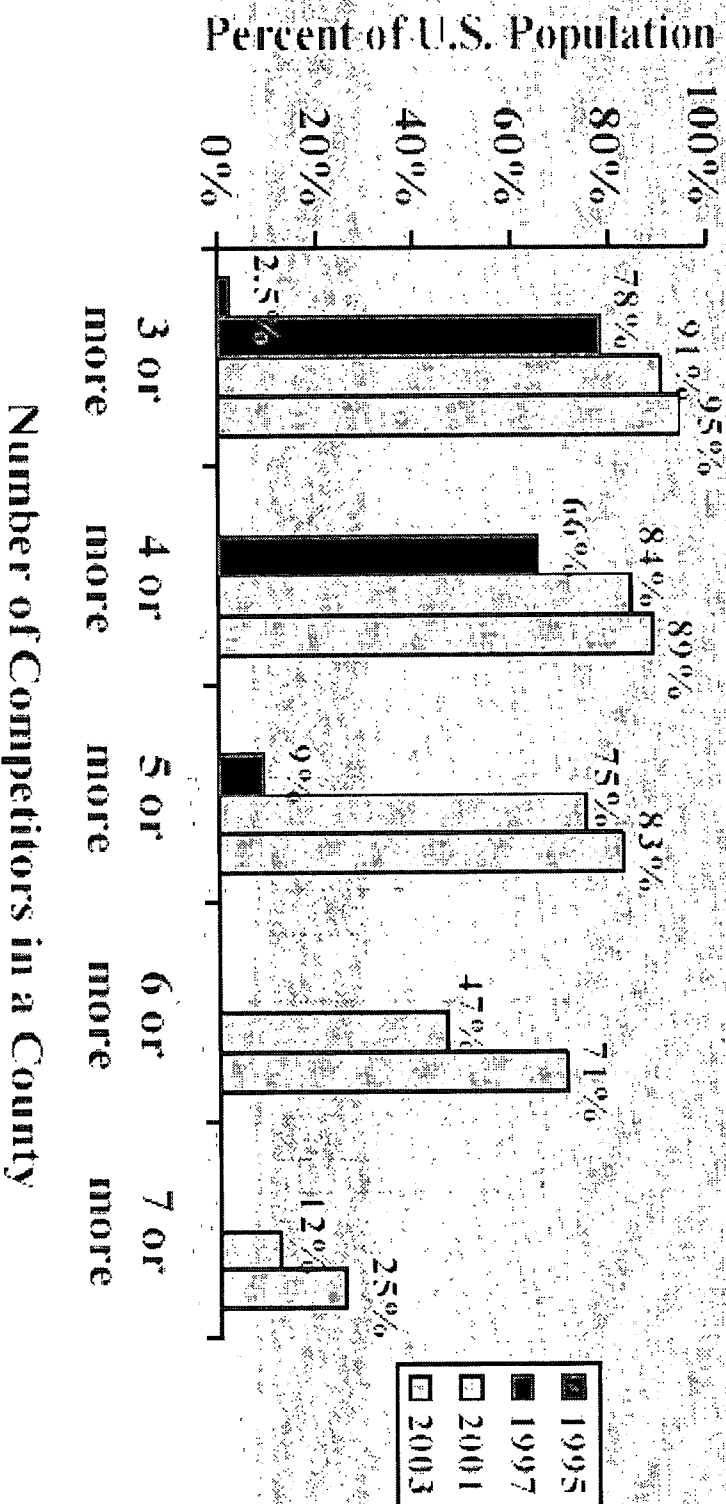
Exhibit C Contains CONFIDENTIAL INFORMATION

Wireless Briefing for Public Utility Commission of Texas



Oct. 14, 2003

Mobile Telephone Competition



Source: Federal Communications Commission

Percent of U.S. Population

Number of Competitors in a County	1995	1997	2001	2003
3 or more	2.5%	78%	91%	95%
4 or more	66%	84%	89%	89%
5 or more	9%	75%	83%	75%
6 or more	47%	71%	71%	71%
7 or more	12%	25%	25%	25%

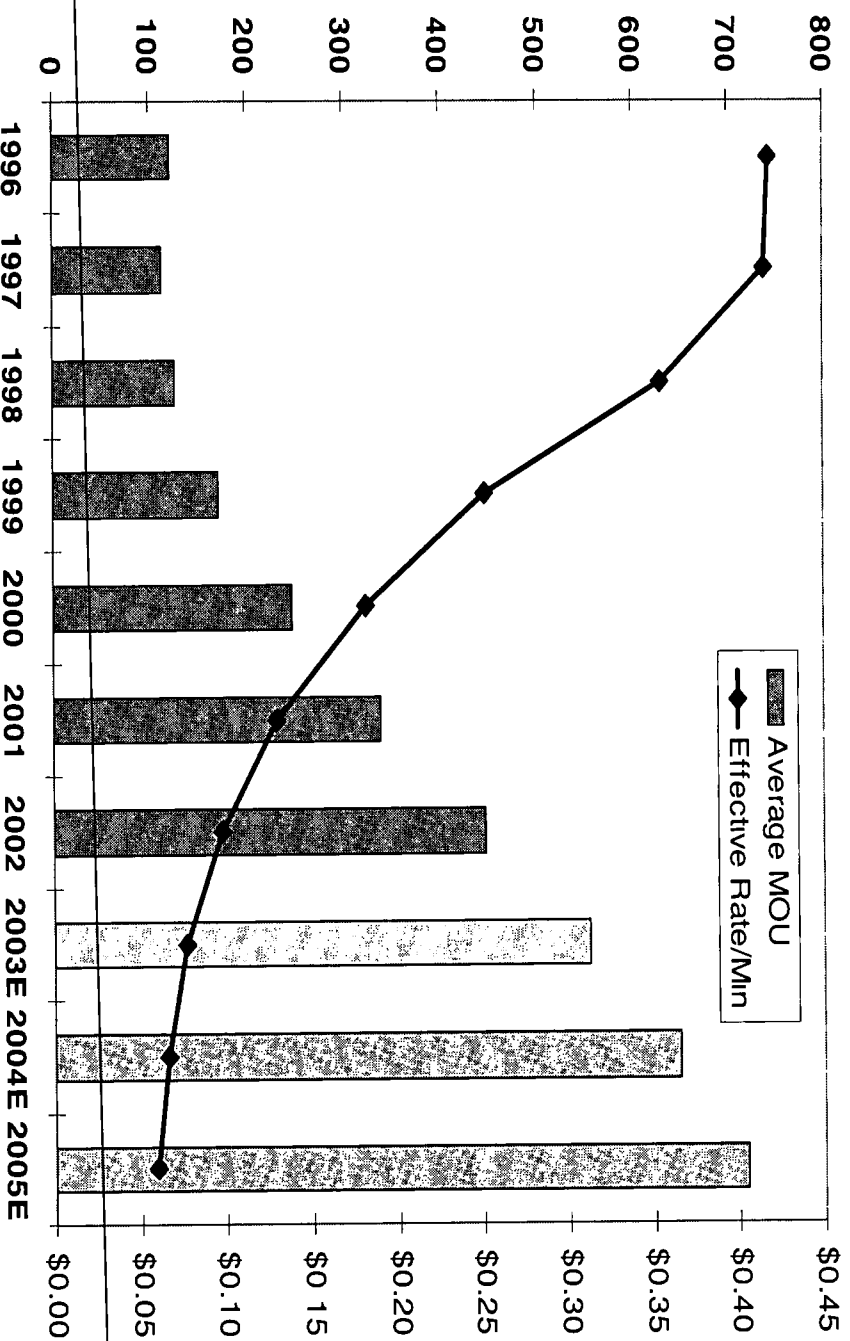
Number of Competitors in a County

Legend: 1995 (dark gray), 1997 (medium gray), 2001 (light gray), 2003 (white)

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Wireless Competition Delivers Higher Values

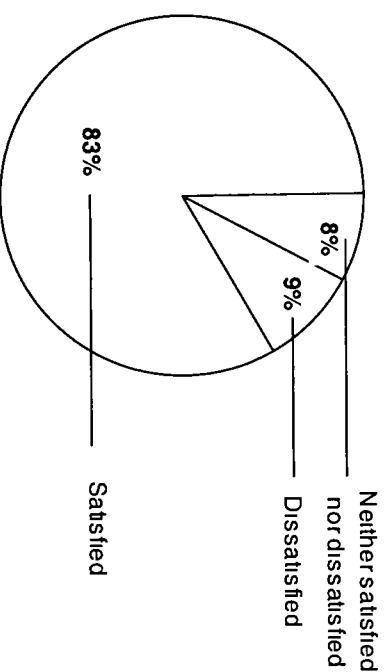
It's not just about lower prices



What GAO Found: 83 % Satisfied

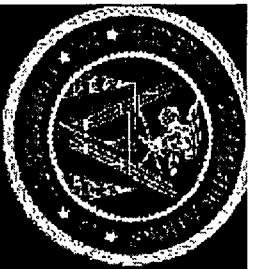
- "... a fairly high percentage of consumers were satisfied with the overall call quality of their mobile phone service. Using the results of our survey of mobile phone users, we estimate that about 83 percent of consumers were satisfied with their call quality and about 9 percent were dissatisfied." GAO Report No. 03-501, page 27.

Figure 6: Overall Customer Satisfaction with Call Quality, November 2002 Consumer Survey

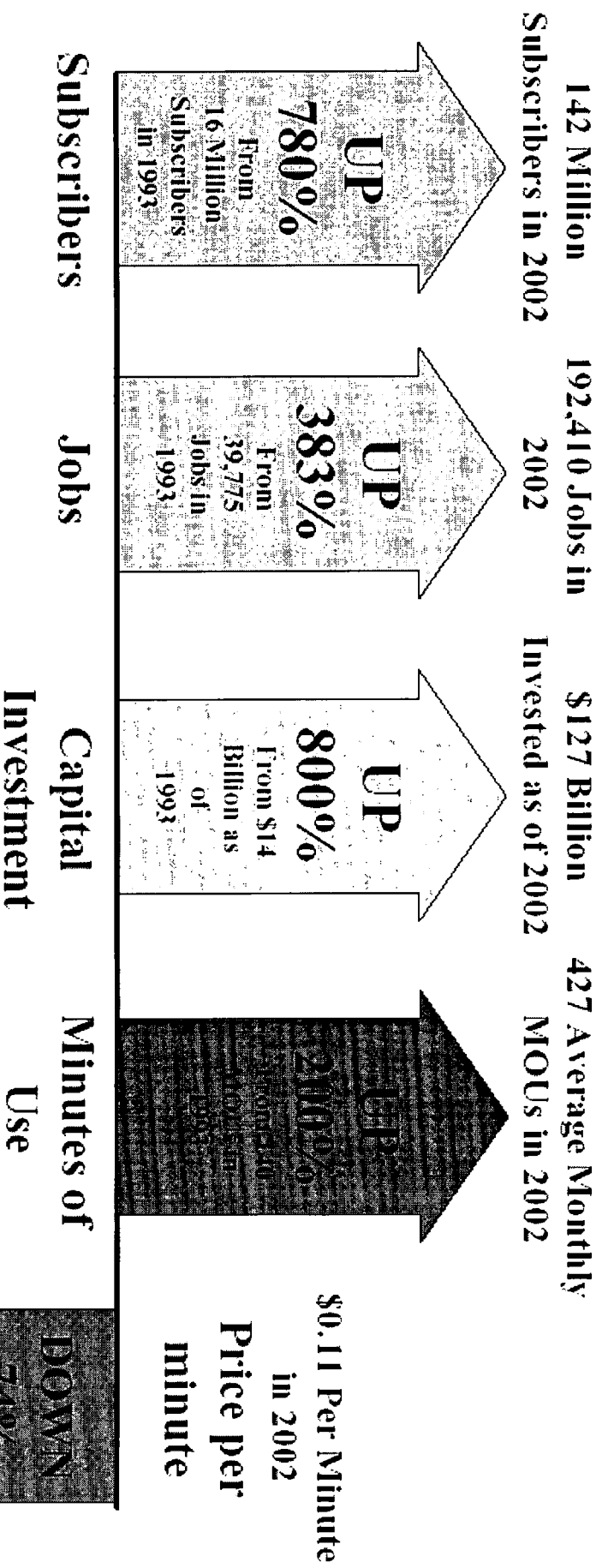


Source: GAO Report 03-501, page 28

CTIA



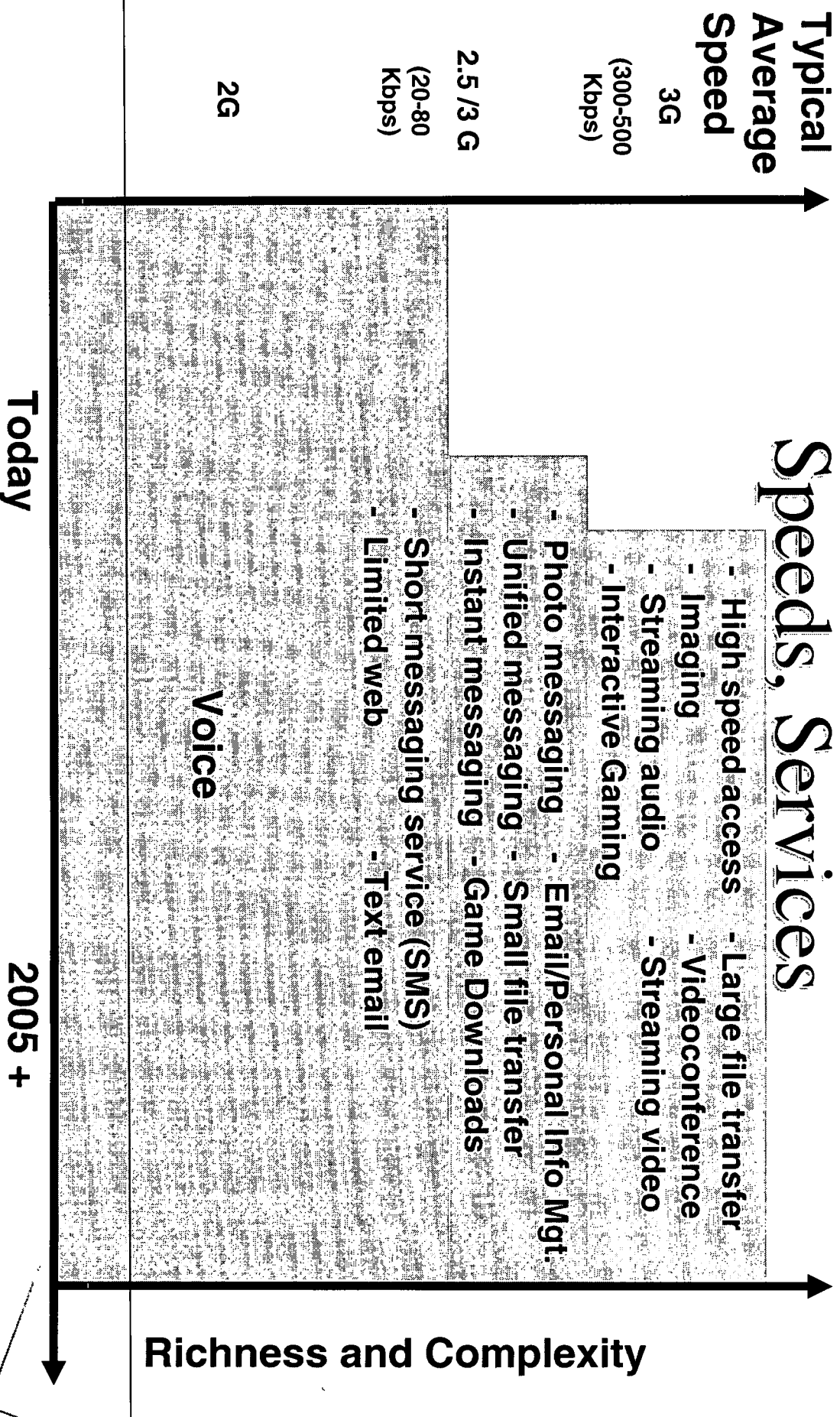
10 Years of Deregulation and Competition: Growth in the Mobile Telephone Industry



Source: Cellular Telecommunications & Internet Association, FCC

Technology evolution:

Speeds, Services



Verizon Wireless' Commitment to LNP

- CEO-level commitment publicly to Yankee Group investment community & letter to FCC June 24.
 - Called on industry to unite to make easy and convenient for consumers to switch.
 - Verizon Wireless' Call to Action:
 - Industry to lead in developing universal process.
 - Process must be easy, automatic and quick.
 - Process must work for customers porting in + out.
 - Verizon will not charge fees for “pre-portability” costs.
-

Local Number Portability

- Verizon Wireless is working hard on LNP implementation November 24, 2003.
- LNP will impact:
 - ✓ Network, IT systems development, and business processes.
 - ✓ tremendous capital and manpower commitment.
- Inter-carrier testing completed:
 - ✓ ATTWS, Cingular, Nextel, SBC, Sprint PCS & Sprint wireline, U.S. Cellular.
- Dedicated Customer Contact Center in Murfreesboro, TN:
 - ✓ Employee Business Training (underway).
 - ✓ Center operations begin in October (mid October).
- Working on SLA's with other carriers & LECs.
 - VZW reached agreement with VZ Com, Sept. 22; others followed.
- FCC Field Visit Murfreesboro, TN Oct. 6.

Verizon Wireless & LNP

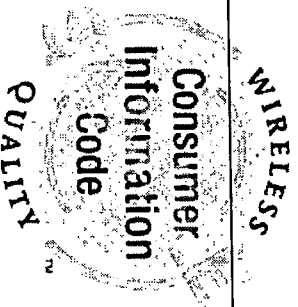
- Porting Should Be “Friction Free” and Reciprocal.
- The porting interval must be timely.
 - Wireless to Wireless – 2.5 hours or less.
 - Wireline to Wireless – No more than 4 days.
- Verizon Wireless issued BFRs - Now LECs/Other Carriers Must Honor.
 - BFR Process should apply to “ALL” carriers.
- Consumer Education is Critical!
 - Limited to Top 100 Markets.
 - Porting interval (911, receiving calls).
- Consumer Expectation Must Be Managed.
 - Possible spike in complaints.

CTIA

Consumer Code for

Wireless Service

- Disclose rates & terms
- Provide service maps
- Provide contract terms/confirm changes
- Allow trial period
- Provide advertising disclosures
- Separately ID carrier charges
- Provide customer right to terminate for contract changes
- Ready access to customer service
- Respond to Agency complaints/inquiries
- Protect customer privacy



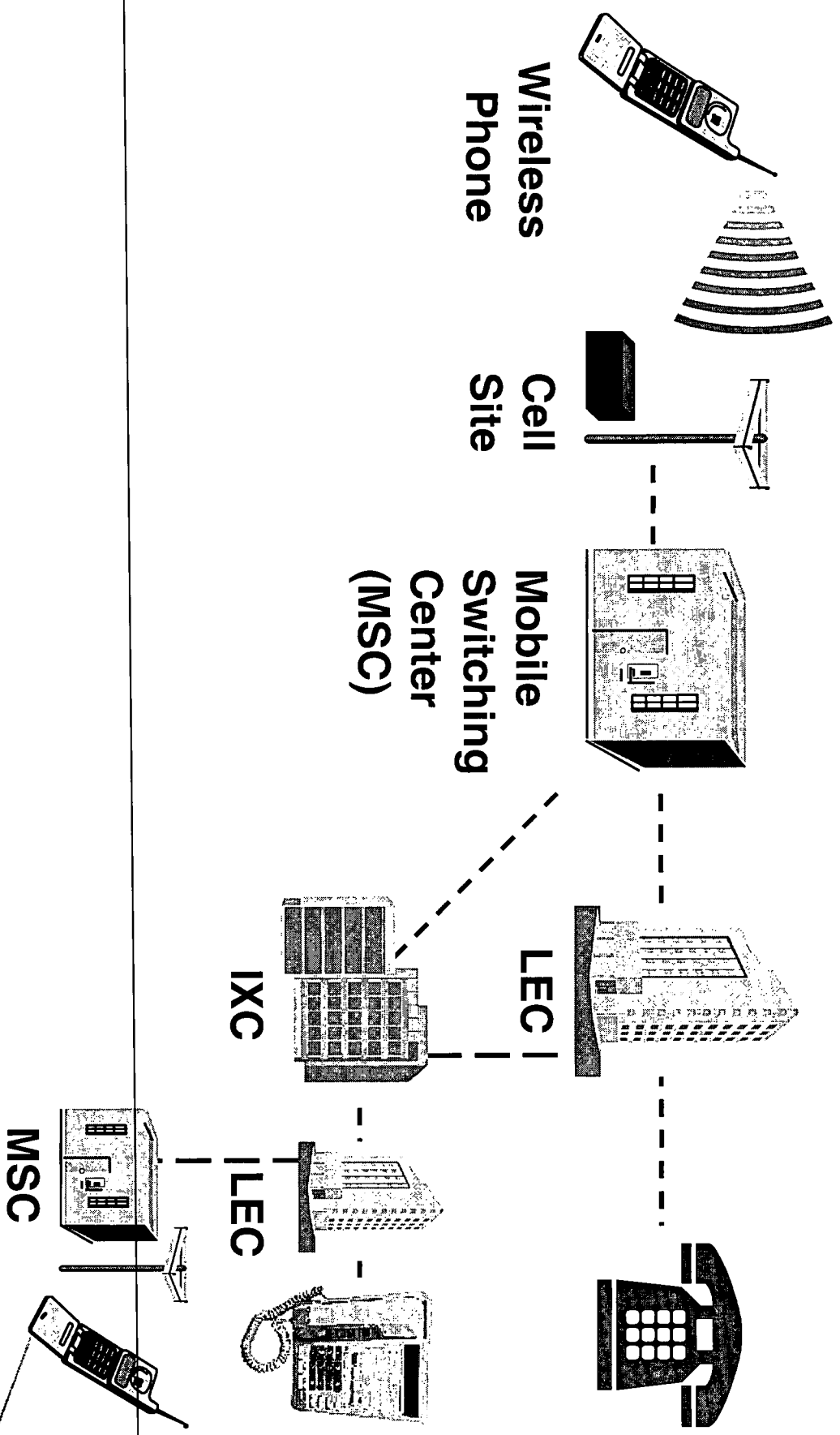
“Worry Free Guarantee”

- Verizon Wireless’ full focus is on attracting and **KEEPING** customers.
 - Keeping customers means customers like us, like their service, and like their treatment – don’t leave.
 - Verizon Wireless has a 5-point customer service standard – a money back guarantee on all equipment and other services without penalty or fees if customer is not satisfied!
 - Largest, most advanced nationwide network.
 - Option to change to any qualifying plan/promotion anytime.
 - Your problem is Our problem, the first time!
 - Free phone every 2 years with New Every Two.
-
- ~~Satisfaction guaranteed on any equipment purchase.~~

Summary

- Industry competition has produced superior results over government regulation: consumers enjoy higher values
- Wireless industry knows to focus on network, clear marketing, quality customer service
- Governments should resist urge to intervene; distortion of competitive market

Verizon Wireless Investments In Infrastructure



VERIZON WIRELESS CLEAR DISCLOSURE

Verizon Wireless Objectives

- To provide customers with the best experience with a wireless company
 - Providing the best network and the best customer service
- Maintain status as the most innovative communications carrier in the nation
- Respond quickly and fairly to our customer's needs
- Provide a variety of means for customers to contact us

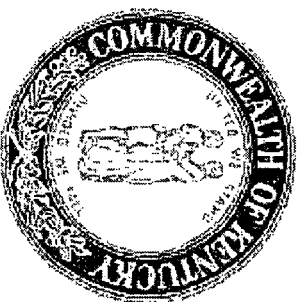
ADVERTISING

- # Verizon Wireless' Continual Efforts to Improve

Exhibit D
Verizon Wireless

Exhibit D Contains CONFIDENTIAL INFORMATION

Verizon Wireless Service in Kentucky



Briefing for

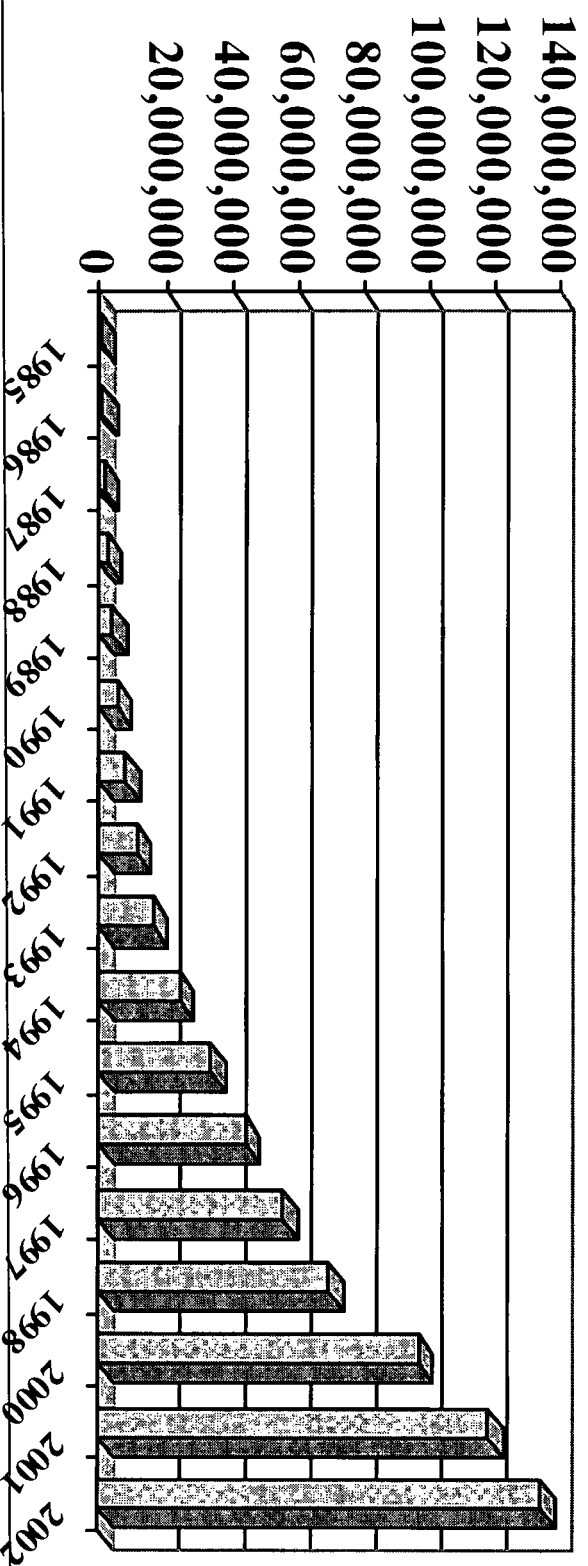
Kentucky Public Service Commission

The Wireless Story

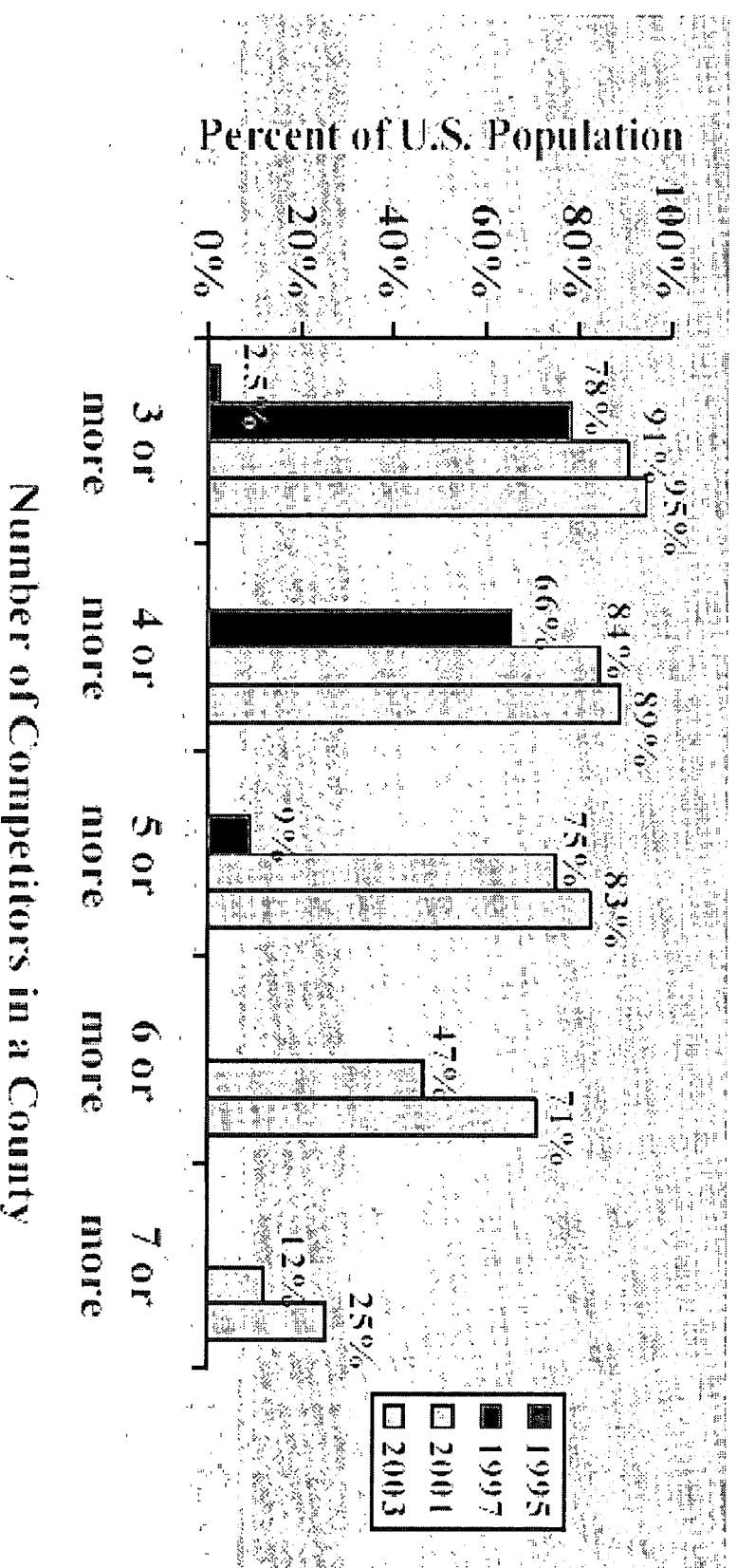
- Cellular service began in 1983 but did not “come of age” until 1998.
- Since 1998, wireless has:
 - Invested \$100+ billion to expand coverage and services.
 - Added nearly 80 million wireless customers – up 120%.
 - Increased wireless use – up 160% from 1998 to today:
 - 2002: Average customer uses 427 wireless minutes per month
- Expanded wireless capacity by 340%
- Brought 3 or more wireless competitors to 278 million (95%) Americans.
- Reduced wireless prices by 32%.

Wireless Industry Subscriber Growth

Continues



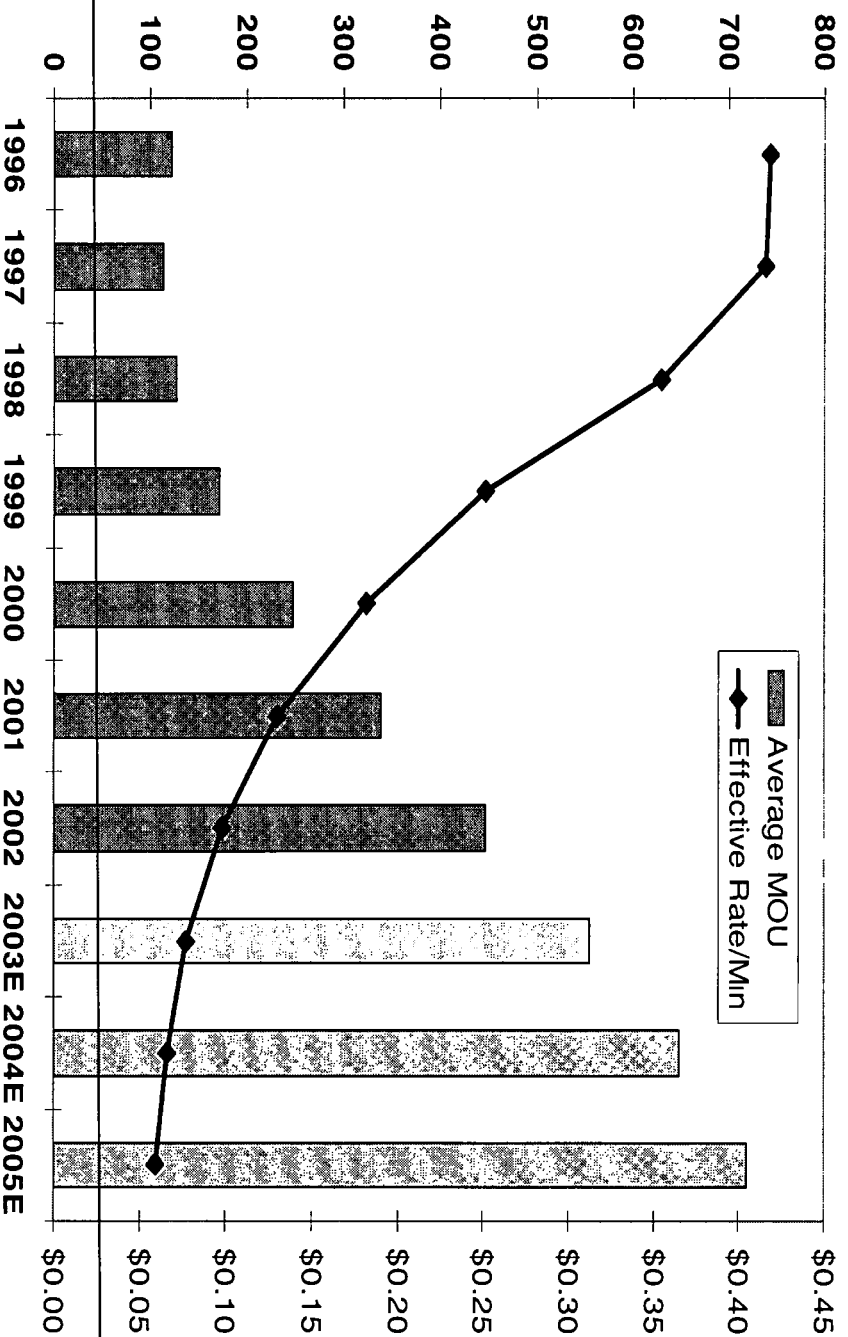
Mobile Telephone Competition



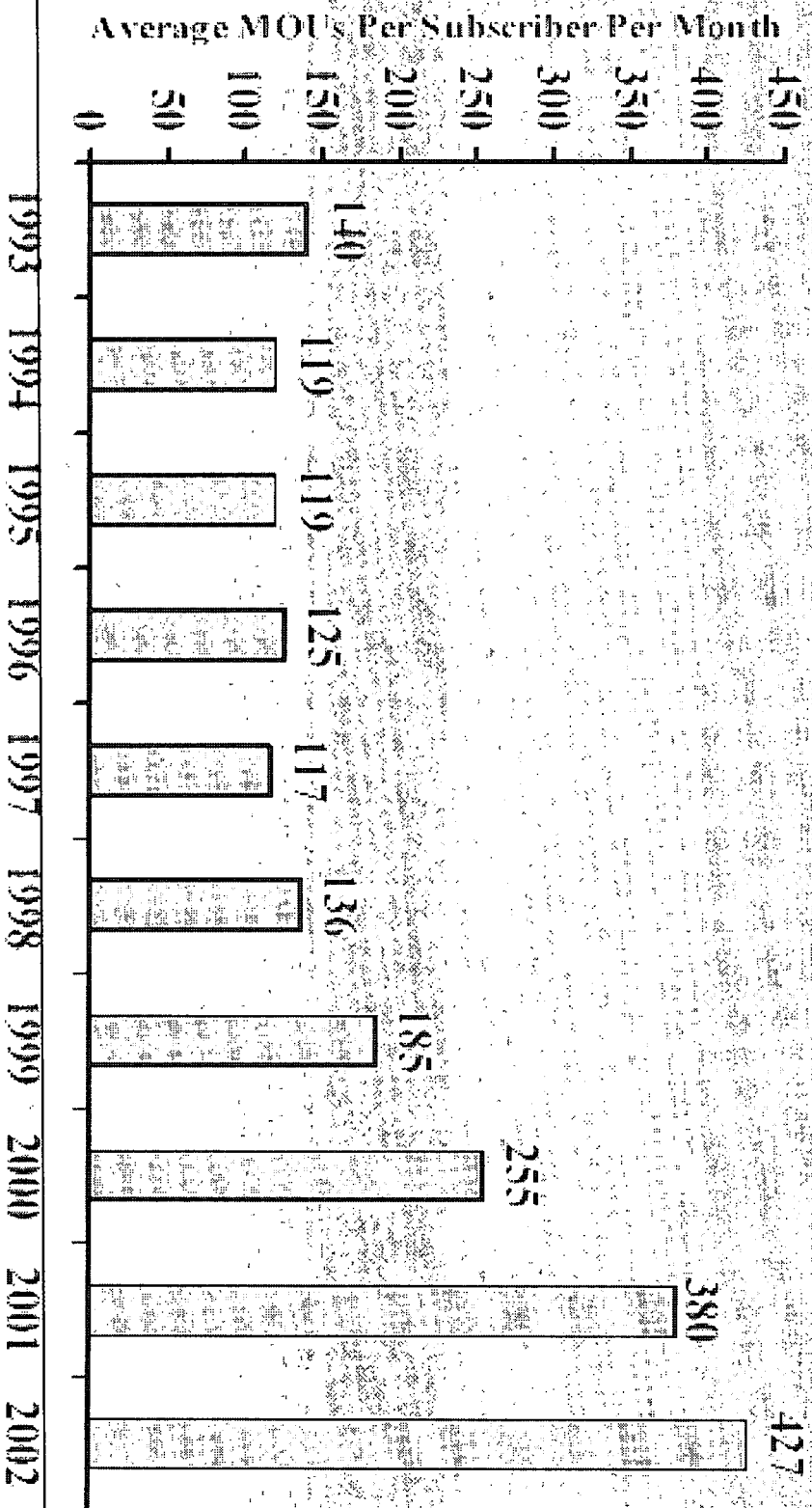
Source: Federal Communications Commission

Wireless Competition Delivers Higher Values

It's not just about lower prices



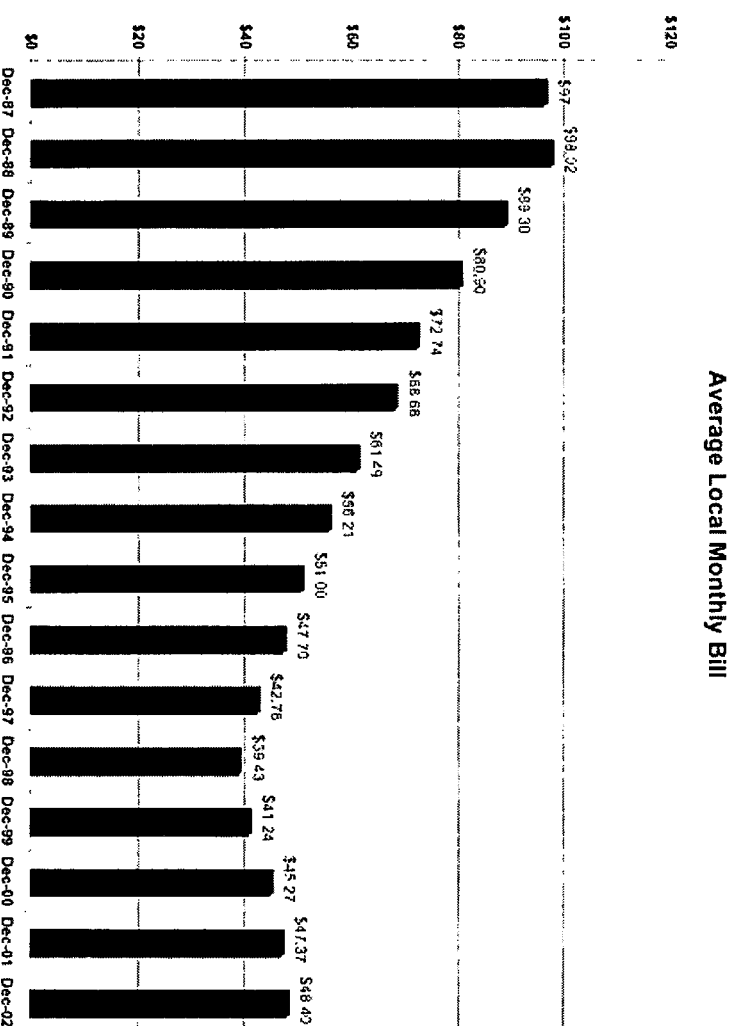
Average Minutes-of-Use per Month



Source: Cellular Telecommunications & Internet Association, 2003

Competition Among Carriers Drives Down the Cost of Wireless Service

Average Local Wireless Monthly Bill: 1987 - 2002

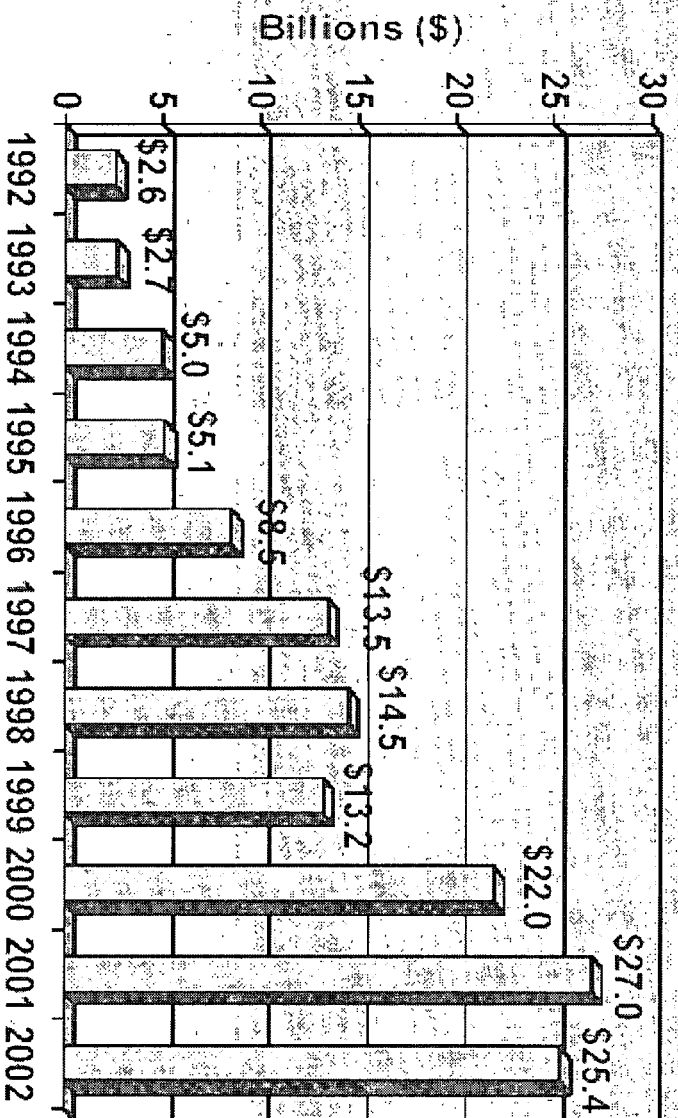


Local Monthly Bill is Up 2.2 Percent Year Over Year

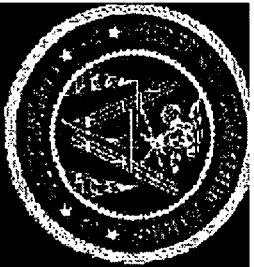
Materials May not be reproduced or photocopied in any form without written permission from CTIA
© 2003 Cellular Telecommunications & Internet Association

Source: CTIA

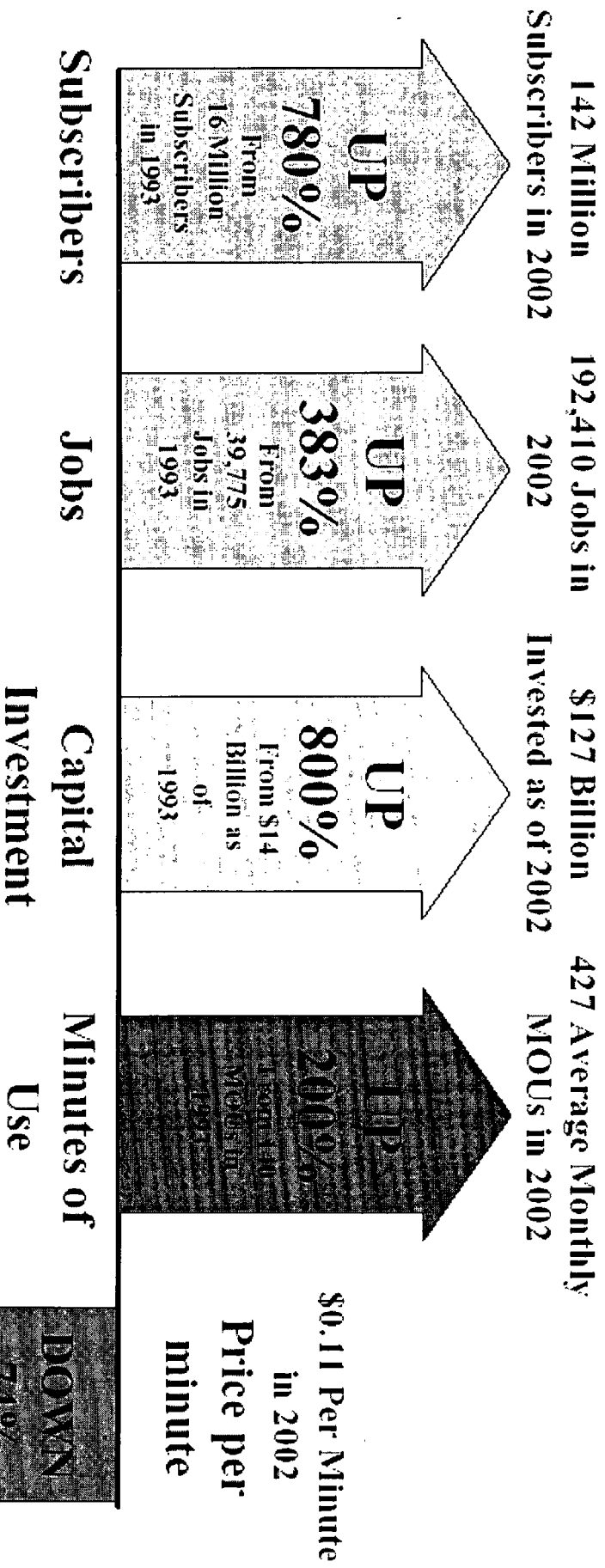
Annual Wireless Capital Investment 1992-2002



Source: Simon Hahn, et al. *US Telecom Year Outlook: Wireless Preview and '03 Outlook*. Morgan Stanley, Equity Research - Industry Report Jan 13, 2003, at 19 (2002-2003). See Dennis et al., *2002 Wireless Preview*. *Wall Street Journal*, Feb. 14, 2002, at 1 (2002-2003).



10 Years of Deregulation and Competition: Growth in the Mobile Telephone Industry



Source: Cellular Telecommunications & Internet Association, FCC

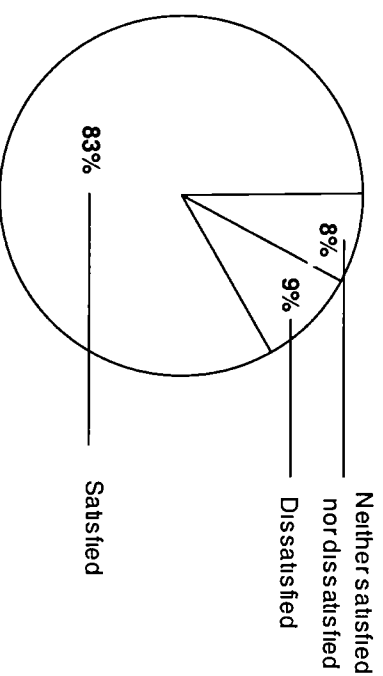
Carriers Compete on the Basis of Customer Satisfaction

- Quality of service is a competitive differentiator.
 - Wireless carriers have spent more than \$100 billion since 1998 to improve and expand their networks. (*CTIA*)
 - Carriers spent \$20 billion in 2001 to improve coverage and develop new equipment in order to improve services.
- High quality is a competitive edge that translates into more customers and higher revenues; poor service guarantees loss of customers and revenues.

What GAO Found: 83 % Satisfied

- “... a fairly high percentage of consumers were satisfied with the overall call quality of their mobile phone service. Using the results of our survey of mobile phone users, we estimate that about 83 percent of consumers were satisfied with their call quality and about 9 percent were dissatisfied.” GAO Report No. 03-501, page 27.

Figure 6: Overall Customer Satisfaction with Call Quality, November 2002 Consumer Survey



Source: GAO Report 03-501, page 28

Wireless: A Competitive Model !

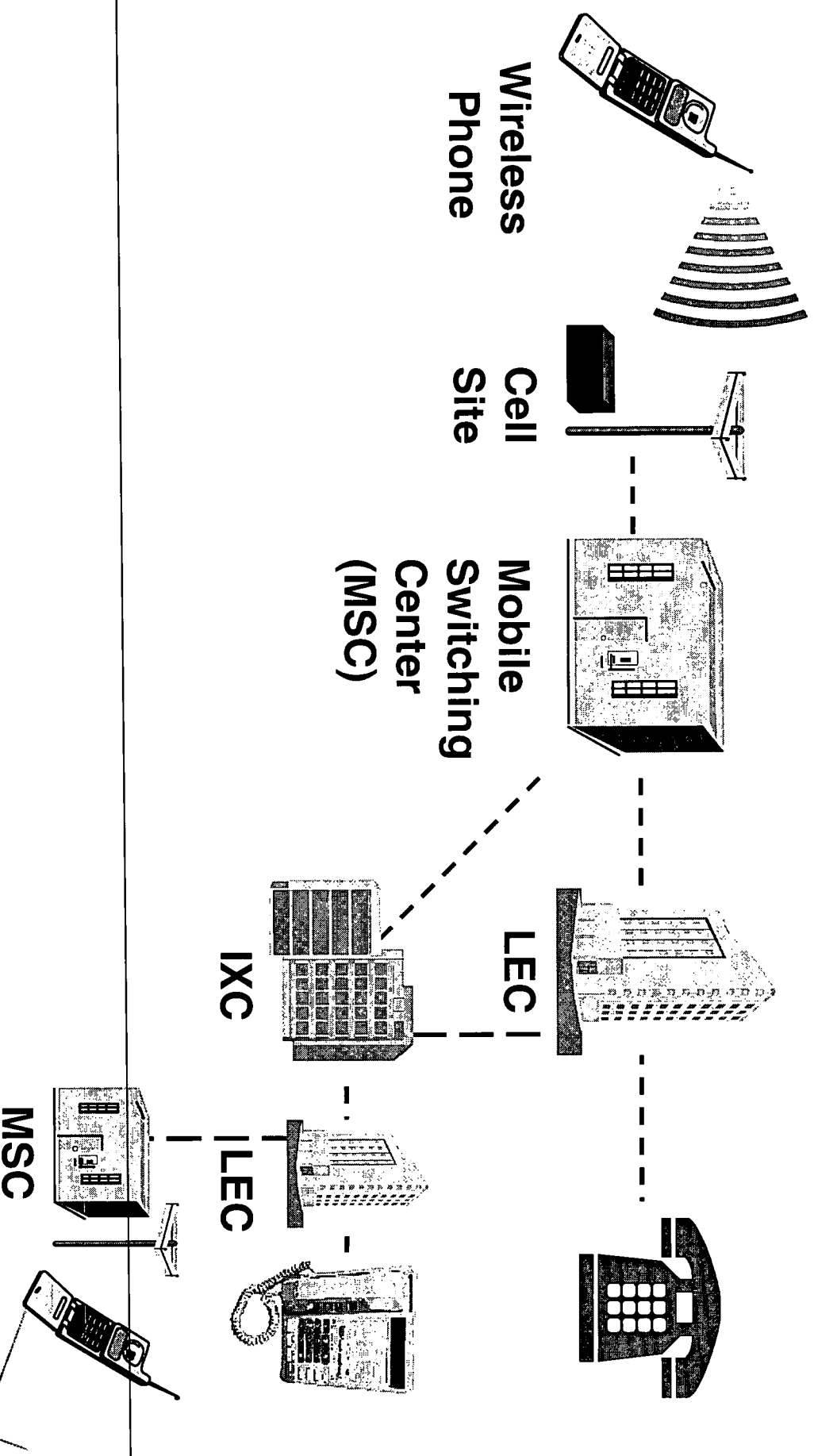
“[The wireless industry] is the most competitive market in the telecommunications industry. This is demonstrated by our findings that there is growth and increasing output, lower and declining prices, increasing innovation, consumer churn and service provider substitutability.”

*Michael K. Powell, Chairman, Federal Communications Commission,
December 18, 2001*

“Wireless service is one of the few telecommunications markets in the United States where competition works.”

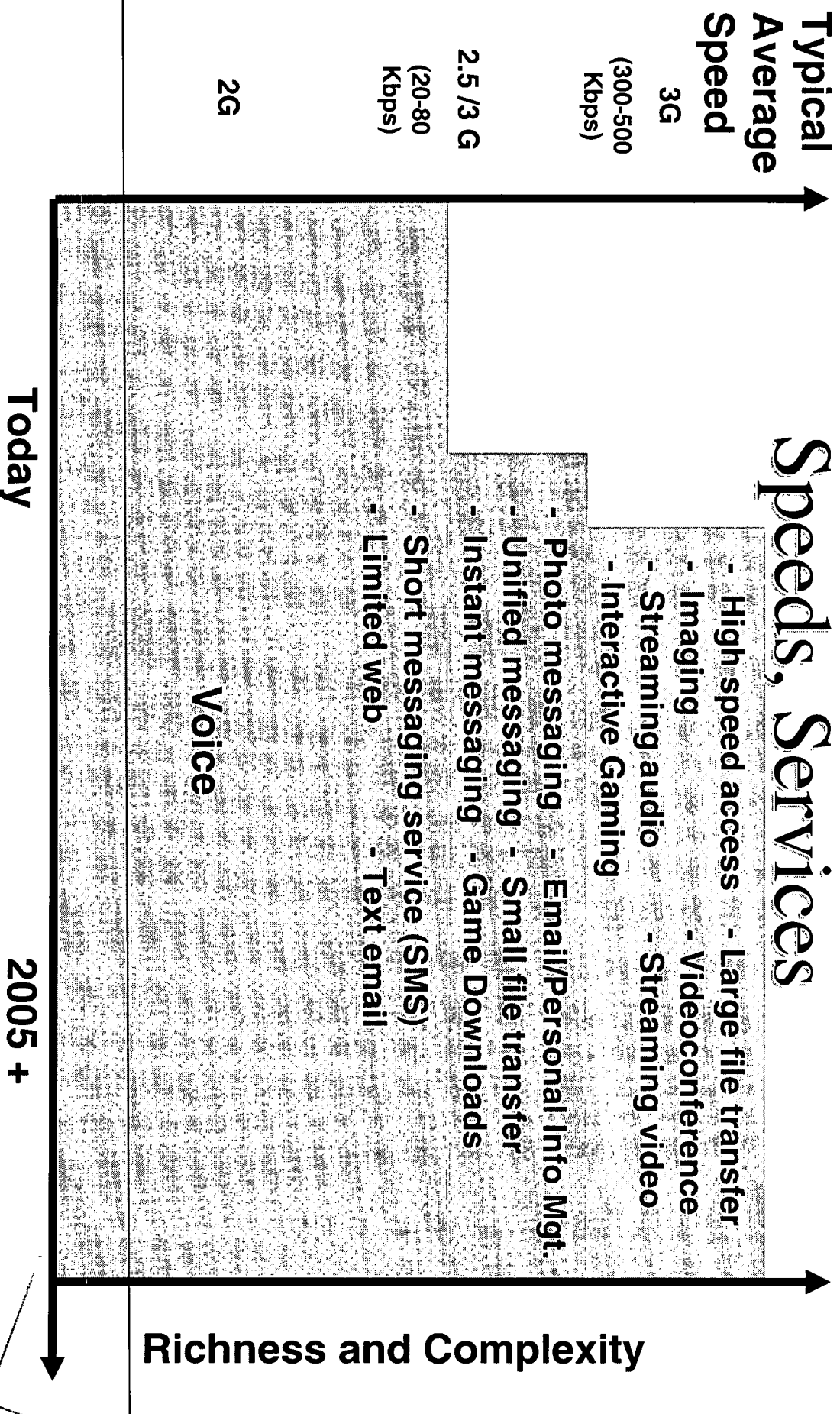
Rob Pegoraro, comparing wireless service plans in the Washington Post, 9/29/02

Verizon Wireless Investments In Infrastructure



Technology evolution:

Speeds, Services



Local Number Portability & Number Pooling

- Verizon Wireless participated in pooling beginning 11/24/2002 (almost 40 of top 100 markets in South) and is working toward LNP for November 2003.
- LNP will impact:
 - ✓ Network, IT systems development, and business processes.
 - ✓ tremendous capital and manpower commitment.
- Inter-carrier testing completed:
 - ✓ ATTWS, Cingular, Sprint PCS & Sprint wireline).
- Dedicated Customer Contact Center in Murfreesboro, TN:
 - ✓ Hiring underway.
 - ☐ Employee Business Training (begins soon).
 - ☐ Center operations begin in October.
- Verizon Wireless moved publicly to support LNP as public policy position on June 24.

Verizon Wireless' Commitment to LNP

- CEO-level commitment publicly to Yankee Group investment community & letter to FCC.
- Called on industry to unite to make easy and convenient for consumers to switch.
- Verizon Wireless' Call to Action:
 - Industry to lead in developing universal process.
 - Process must be easy, automatic and quick.
 - Process must work for customers porting in + out.
- Verizon Wireless will treat porting out customers exactly same as other customers.
- Verizon will not charge fees for “pre-portability” costs.

VZW's Reply to CTIA Petition

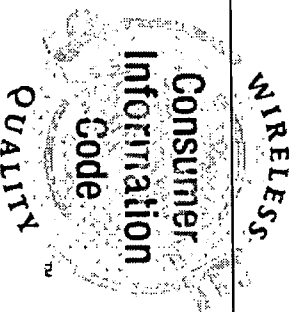
- Encouraged FCC to act on both January 23 and May 13 CTIA Petitions.
- Porting Should Be “Friction Free” and Reciprocal.
- The Porting Interval Issue Does Not Affect E911 Policies.
 - Existing rules address situations where callback by PSAP not possible).
 - Point of sale activation approach would provide short-term *origination-only* service offerings.
- FCC Must Ensure That Carriers Do Not Abuse the Bona Fide Request Requirement.
 - BFR Process should apply to “ALL” carriers.

CTIA

Consumer Code for

Wireless Service

- Disclose rates & terms
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- Provide contract terms/confirm changes
- Allow trial period
- Provide advertising disclosures
- Separately ID carrier charges
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- Protect customer privacy



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- Respond quickly and fairly to our customer's needs
- Provide a variety of means for customers to contact us

VERIZON WIRELESS ADVERTISING

- When Advertising Rate, Disclose All Material Conditions
- When Advertising Service, Disclose All Material Conditions
- When Advertising Network Size, Disclose All Material Conditions
- “Test Man” Character Memorably Discloses Intrinsic Characteristics of Wireless Service and Verizon Wireless’ Continual Efforts to Improve Its Wireless Service

Rate Disclosures

**Now take
all your minutes
across America.**

**On the America's
Choice network.
Every month as
long as you remain
on the same calling
plan. With 1 or 2
year contract. For a
limited time only.**



Domestic long distance is 20¢/minute within your home airline rate area.* Domestic roaming is 69¢/minute (includes domestic long distance charges).**

One or two year agreement required. No activation fee for two year agreements. \$30 activation fee on one year agreements. \$175 early termination fee will apply.

Long Distance and roaming rates for international calls where available will vary.

*** Airtime charges apply.**

****20¢/minute call delivery charge applies to calls received while roaming.**

ADVERTISING

Collateral Rate Disclosures

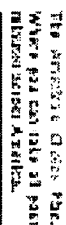
America's Choice - Calling Plans	
Monday Afternoon	<p>10:00 AM - 12:00 PM</p> <p>12:00 PM - 2:00 PM</p> <p>2:00 PM - 4:00 PM</p> <p>4:00 PM - 6:00 PM</p> <p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>
Monday Evening	<p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>
Monday All-Weekend	<p>12:00 PM - 2:00 PM</p> <p>2:00 PM - 4:00 PM</p> <p>4:00 PM - 6:00 PM</p> <p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>
Tuesday All-Week	<p>12:00 PM - 2:00 PM</p> <p>2:00 PM - 4:00 PM</p> <p>4:00 PM - 6:00 PM</p> <p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>
Wednesday All-Week	<p>12:00 PM - 2:00 PM</p> <p>2:00 PM - 4:00 PM</p> <p>4:00 PM - 6:00 PM</p> <p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>
Thursday All-Week	<p>12:00 PM - 2:00 PM</p> <p>2:00 PM - 4:00 PM</p> <p>4:00 PM - 6:00 PM</p> <p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>
Friday All-Week	<p>12:00 PM - 2:00 PM</p> <p>2:00 PM - 4:00 PM</p> <p>4:00 PM - 6:00 PM</p> <p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>
Saturday All-Week	<p>12:00 PM - 2:00 PM</p> <p>2:00 PM - 4:00 PM</p> <p>4:00 PM - 6:00 PM</p> <p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>
Sunday All-Week	<p>12:00 PM - 2:00 PM</p> <p>2:00 PM - 4:00 PM</p> <p>4:00 PM - 6:00 PM</p> <p>6:00 PM - 8:00 PM</p> <p>8:00 PM - 10:00 PM</p> <p>10:00 PM - 12:00 AM</p>

Calls must be placed in the designated Verizon Wireless America's ChoiceSM and/or Local DigitalChoice[®] rate area. . . . Rates do not apply to credit card or operator assistance calls, which may be required in certain areas. Airtime is rounded to the next full minute, so actual allowance may vary. Unused airtime minutes are lost. Charges for calls that connect begin when you press "SEND" while placing a call, or upon connection to the system. On incoming calls, charges may begin prior to the phone ringing and before you press "SEND" to receive the call. Charges end when the call disconnects from the system, which may be a few seconds after you press "END".

Calls to certain fax/data modems incur charges, though it may sound as if the call was unanswered. Airtime is charged on calls to toll-free numbers. On Local DigitalChoice® plans, wireless long distance rates may be incurred when calling from your home airtime rate area to points in the United States (including points in your home airtime rate area), Canada, United States Virgin Islands and Puerto Rico. Wireless long distance rates may also be incurred for certain calls received within your home airtime rate area.

There may be times when you are roaming on another carrier's network. The billing for roaming minutes used on another carrier's network and related long distance charges (if applicable) may be delayed depending on when Verizon Wireless is billed by the other carrier. These roaming minutes may be applied against your monthly airtime

may result in phone charges in addition to , your monthly access charge. Toll, taxes and surcharges, including the Federal Universal Service and Regulatory Fee resulting from our costs of Federal Government assessments, apply and are in addition to airtime.



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MDR LINE

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WELLSFARGO.COM



Service Disclosures

Geographic & other restrictions apply. Not available in all markets.

VERIZON WIRELESS

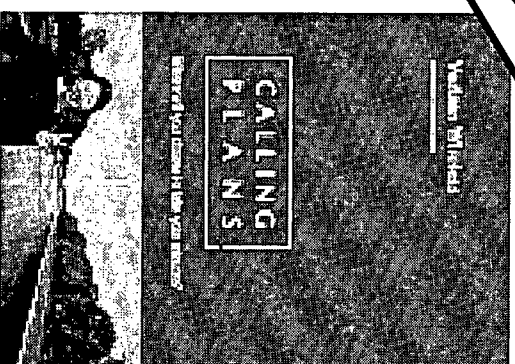
ADVERTISING

Collateral Service Disclosures

Verizon Wireless

Digital services and features not available in all areas. Geographic and other restrictions apply. Automatic roaming may not be available in all areas.

For more information, visit www.verizonwireless.com.



IMPORTANT MAP INFORMATION

Wireless service subject to network and transmission limitations, including cell site unavailability, particularly in remote areas. Alaska has limited service. Customer equipment, weather, topography and other environmental considerations associated with radio technology will affect service.

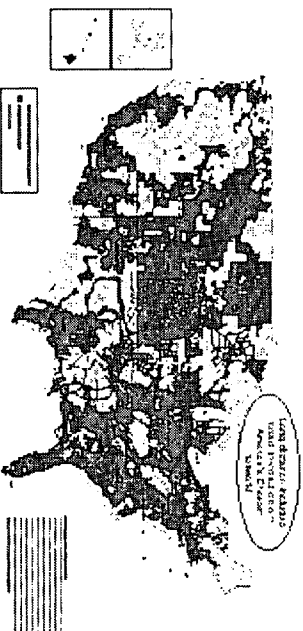
VERIZON WIRELESS ADVERTISING

Collateral Explanatory Rate Maps

INTRODUCING

America's Choice

Now your home area
stretches coast-to-coast!



- \$35 monthly access plan available
- Call close to home or coast-to-coast
- Your best value in national wireless calling plans.

verizonwireless

We never stop working for you.

Important Map Information

The America's Choice rate map shows approximately where rates apply and is not a depiction of actual service, or rate availability or wireless coverage. Check roaming indicator on your wireless phone to determine actual areas where rates are available. The mapped territories contain areas with no service.

assessw **no** **new**